

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CHRISTINE CONFORTI

Plaintiff,

vs.

CHRISTINE GIORDANO HANLON, in her
official capacity as Monmouth County Clerk,
SCOTT M. COLABELLA, in his official
Capacity as Ocean County Clerk; and PAULA
SOLLAMI COVELLO, in her official capacity
as Mercer County Clerk,

Defendants.

Civil Action No. 3:20-cv-08267-FLW-TJB

**NOTICE OF MOTION TO
DISMISS PLAINTIFF'S COMPLAINT
AS TO DEFENDANT, CHRISTINE
GIORDANO HANLON, in her official
capacity as Monmouth County Clerk,
PURSUANT TO F.R.C.P. 12(b)(6)**

TO COUNSEL:

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*Attorneys for Defendant, Scott M. Colabella,
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NOTICE IS HEREBY GIVEN that on January 4, 2021, at 9 a.m., or as soon thereafter as the matter can be heard before the Honorable Magistrate Judge Tonianne J. Bongiovanni in the United States District Court for the District of New Jersey, Trenton Vicinage, Defendant Christine Giordano Hanlon, in her official capacity as Monmouth County Clerk (hereinafter “Hanlon”) will move before the Court to enter an Order dismissing plaintiff’s Complaint as to Hanlon, pursuant to both Federal Rule of Civil Procedure 12(b)(6) and Local Rule 12.1.

The motion is made on the grounds that the Complaint of plaintiff, Christine Conforti (hereinafter “plaintiff”) cannot state a cause of action as to Hanlon, and that Hanlon is entitled to dismissal of all claims in plaintiff’s Complaint, with prejudice. This motion will be based on this Notice of Motion and Motion, the Memorandum in Support thereof, Declaration of Erik Anderson, Esq., as served and filed herewith, the records and file herein, and on such evidence as may be presented at the hearing of the motion.

DATED: December 7, 2020

/S/ Erik Anderson, Esq.

ERIK ANDERSON, ESQ.
Thomas W. Carter, Esq.
Reardon Anderson, LLC
*Attorneys for Defendant,
Christine Giordano Hanlon, in
her capacity as Monmouth County Clerk*